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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JESUS AGUILAR-MENDOZA,  
  
Defendant.

CASE NO. 2:24-CR-00202-DJC

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: March 13, 2025  
TIME: 9:00 a.m.  
COURT: Daniel J. Calabretta

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on March 13, 2025.
2. By this stipulation, defendant now moves to continue the status conference until May 22, 2025, at 9:00 AM, and to exclude time between March 13, 2025, and May 22, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes investigative reports and related documents exceeds 1000 pages of documents. All of this discovery is in the process of being produced directly to counsel and/or made available for inspection and copying.

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b) Counsel for defendant desires additional time to consult with his client, review the current charges, conduct investigation and research related to the charge, review and copy discovery for this matter, discuss potential resolutions with his client, and otherwise prepare for trial.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of March 13, 2025 to May 22, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 7, 2025

MICHELE BECKWITH  
Acting United States Attorney

/s/ ZULKAR KHAN  
ZULKAR KHAN  
Assistant United States Attorney

1 Dated: March 7, 2025

/s/ Hootan Baigmohammadi

Hootan Baigmohammadi

Counsel for Defendant

Jesus Aguilar-Mendoza

5 **ORDER**

6 IT IS SO FOUND AND ORDERED this 10<sup>th</sup> day of March, 2025.

8 Dated: March 10, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA

UNITED STATES DISTRICT JUDGE